

In the United States District Court for the Eastern District of Pennsylvania

Andrew R. Perrong,

Plaintiff,

v.

MS International Enterprises (“MSIE”)

d/b/a “Certified Enrollment Center”

Kashan Charles Riley; Jane Darlene

Riley; Jawad Nesheiwat; & Does 1-100

Defendants.

No. 18-cv-04760-NQA

ORDER

AND NOW, this _____ day of December 2018, after consideration of Defendant Jawad Nesheiwat’s Motion for Extension of Time to Respond to the Plaintiff’s Complaint, and any response thereto it is HEREBY ORDERED that the Motion is GRANTED. Defendant Jawad Nesheiwat shall file his response to Plaintiff’s Complaint (Doc. 1) on or before December 17, 2018.

By the Court:

Hon. Nitza I. Quinones Alejandro
United States District Judge

In the United States District Court for the Eastern District of Pennsylvania

Andrew R. Perrong,

Plaintiff,

v.

MS International Enterprises (“MSIE”)

d/b/a “Certified Enrollment Center”

Kashan Charles Riley; Jane Darlene

Riley; Jawad Nesheiwat; & Does 1-100

Defendants.

No. 18-cv-04760-NQA

**Defendant Jawad Nesheiwat’s
Motion for Extension of Time to Respond to the Plaintiff’s Complaint**

Now comes Defendant Jawad Nesheiwat, by and through his undersigned counsel, and respectfully moves the Court to extend by fourteen (14) days his deadline to respond to the Plaintiff’s Complaint (Doc. 1), averring in support thereof as follows:

1. Plaintiff filed a Complaint on November 2, 2018 (Doc. 1).
2. Plaintiff effectuated service of the Complaint on Defendant Jawad Nesheiwat on November 13, 2018.
3. The current deadline for Defendant Jawad Nesheiwat to file a response to the Complaint is December 3, 2018.
4. Defendant, who has recently retained the undersigned counsel, respectfully requests an additional fourteen (14) days to file a response to the Complaint.
5. Plaintiff, who is *pro se*, does not object to the Defendant’s requested relief and Defendant Nesheiwat has agreed to waive any potential defense(s) related to service of the Complaint (but explicitly reserved any potential defense(s) as to personal jurisdiction).

WHEREFORE, Defendant Jawad Nesheiwat respectfully requests the Court to:

- a. Grant this Motion;
- b. Extend the time for the Defendant to file his response to the Complaint by fourteen (14) days; and
- c. Grant such further relief that the Court deems just and equitable.

Respectfully submitted,

Dated: December 3, 2018


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*Attorney for Defendants
MS International Enterprises d/b/a Certified
Enrollment Center , Kashan Charles Riley, Jane
Darlene Riley, and Jawad Nesheiwat*

Certificate of Service

I hereby certify that on the date set forth below, I caused a true and correct copy of the foregoing document to be served upon the following via the Court's Electronic Case Filing system:

Andrew R. Perrong
1657 The Fairway #131
Jenkintown, PA 19046
Pro Se Plaintiff

Dated: December 3, 2018

/s/ Marisa Rachel De Feo
Marisa Rachel De Feo